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March 10, 2006

TO-001-05-09-001-DCN098

Mr. Dennis Matlock
On-Scene Coordinator
U.S. EPA - Region III
Wheeling Office - Methodist Bldg.
1060 Chapline Street
Wheeling, WV 26003-2995

Reference: Contract No. EP-S3-05-03; Work Assignment W03-001-05-09-001;
8th and Plutus Pottery Site; Removal Action Implementation Plan Review

Dear Mr. Matlock:

START has completed the attached draft review of the Response Action Plan (Revision 001) Supplement 1 Removal Action Implementation Plan dated January 2006, submitted to you by ENSR International on behalf of Newell Holdings Delaware, Inc. If you have any questions or concerns regarding this document or this site, please feel free to contact me at (304)-230-1230.

Sincerely,

William Huggins, Jr.
Project Manager

cc: L. Burris/Central Files

START Review Comments (03/10/06)
of the
Response Action Plan (Revision 001) Supplement 1 Removal Action Implementation Plan
for
Chester, Hancock County, West Virginia
dated January, 2006

TechLaw, Inc., the United States Environmental Protection Agency (EPA) Region III Superfund Technical Assessment and Response Team (START) - West contractor, has reviewed the Amendment No.1 to Response Action Plan (RAP) Revision 001, Supplement 1, Removal Action and Implementation Plan dated January 2006, for the 8th and Plutus Streets Pottery Site (Site/facility), located in Chester, Hancock County, West Virginia. This plan was written by ENSR International Inc., under contract with Newell Holdings Delaware, Inc., the respondent in an Administrative Order of Consent (Docket No. CERC-03-2004-0255DC) with the EPA. As part of the Administrative Order of Consent (AOC), the respondent, provided this plan to EPA for review within the designated time frame. The document and its attachments were reviewed under EPA Contract No. EP-S3-05-03, Technical Direction Document (TDD) No. WO3-001-05-09-001. Comments are provided below.

Comment No./ Report Section	**Comment**
1. Acronym List	The report fails to include an acronym list.
2. Section 1.0	(Paragraph 1) This paragraph specifies (or indicates) that "the subject of the Consent Order is the property" when in fact the subject of the Consent Order not only includes the "property" which is referenced by parcel boundaries, but by the eventual spatial delineation of contamination at the Site. This delineation could ultimately extend beyond the site property boundaries.
3. Section 1.0	(Paragraph 4) It is written in this paragraph that the "additional investigation was necessary to further delineate selected metals." The report should specify the metals of concern in this section.
4. Section 1.2.1	(Paragraph 1) The report indicates that the site is bounded to "the east by Marks Run "flood plain." The site description should include the school property in the description of the western boundary as contamination has been detected in samples beyond the "flood plain" area.

5. Section 1.2.1 (Paragraph 1) The report indicates that ceramic shards and ceramic debris "extend into the U.S. Route 30 right of way, in an area measuring about 500 feet long by 50 feet wide." Areas that are covered by ceramic debris extend beyond the boundaries of this area. As such, a more detailed explanation as to the lateral extent and thickness of debris in this area should be written so that this area can easily be differentiated from areas that have a less dense concentration of ceramic chards and debris. Also, the report fails to identify the area of ceramic chards and debris that is present along the bank of (and possibly in) the Ohio River.

6. Section 1.2.1 (Paragraph 2) The third sentence in this paragraph includes an inadvertently placed period where a comma apparently should be present.

7. Section 1.2.1 (Paragraph 2) The second to last sentence in this paragraph indicates that a section of the former office building is "reportedly occupied by full time residents." Instead of using the term "residents", it is recommended that the term "tenants" be used as to indicate the rental situation.

8. Section 1.2.1 (Paragraph 3) The report indicates that a "private utility locator was contracted to locate the buried portions of the gas line in the field." The report does not include the results of this survey.

9. Section 1.2.2 (Paragraph 2) The report indicates that "several phases of construction/facility expansion are evident." The report should mention that the different phases were of differing construction types.

10. Section 1.2.2 (Paragraph 2) The last sentence in this paragraph indicates that the "topography in and adjacent to the Site on the topographic maps is essentially the same in each of the topographic maps reviewed (i.e. 1960 to 1996 maps)." It is unclear if the topography in the area of the Route 30 bridge was changed during its construction. If so, this section should indicate that fact.

11. Section 1.2.2 (Paragraph 3) This section of the report fails to include any mention of the brake rebuilding business (Saturn) that historically used the facility as its business location.

12. Section 1.2.3 The report indicates in this section that "no plans have been filed for redevelopment of the property." It is unclear as to which office/agency this is referring. The report should clarify the information that is or is not known without generalization.

13. Section 1.3 (Paragraph 2) This section indicates that the Extent of Contamination Study (ECS) "has been completed." Based on several results, horizontal and/or vertical delineation has not been achieved. This will be further addressed in the General Comments section.

14. Section 1.4 The structural evaluation only included a condition assessment study of the main facility building. There is no mention of a structural evaluation of other structures (water tank, office building, etc.) within the report. These structures should be included as outlined in paragraph 8.3.m of the Consent Order.

15. Section 1.4 (Paragraph 4) The second sentence in this paragraph indicates that "areas that were unsafe to enter were observed from safe areas." It is difficult to believe that all areas were able to be adequately viewed from safe areas based on the condition assessment study recommendations and apparent lack of lighting.

16. Section 2.1 (Paragraph 1) The first sentence fails to mention the additional ECS sampling conducted in November 2005.

17. Section 2.1 (Paragraph 1, bullet 1) One of the primary objectives was to "delineate the nature and extent of adversely impacted soil." This bullet should read "adversely impacted soil/sediment."

18. Section 2.2 Cobalt is no longer listed in the RBC Table (October 2005). The last sentence in this section indicates that "given the analytical results from previous DEP and EPA sampling efforts, water was not impacted from the Site and did not require further evaluation." It is suggested that the sentence read "Given the results from previous DEP and EPA sampling efforts, the further investigation of surface water was determined to not be necessary during the ECS." Although the above mentioned results indicate that surface water is not impacted, it is unclear if the absolute determination of a lack of impact is warranted.

19. Section 2.2.1 (Paragraph 3) The report does not explain how the 50-foot grid was laid out (i.e.measuring tape, transit, etc...) nor does this section indicate the relative accuracy of the GPS unit used to mark the grid nodes.

20. Section 2.2.1 (Paragraph 5) In the description of soil samples collected for analysis, it should be mentioned that not all depths listed were sampled at all locations, possibly due to a shallower interface with native soil in some cases.

21. Section 2.2.1 (Paragraph 6) This paragraph indicates that "ENSR analyzed (the) samples sequentially by depth in the field using XRF technology." It should be specified, however, that samples were not analyzed in order of collection geographically.

22. Section 2.2.1 (Paragraph 6) The sentence in the previous comment continues to read "the extent of lead at concentrations equal to or greater than 400 mg/kg was defined, with a few exceptions." The exceptions indicate a failure to comply with the requirements of the Consent Order in regards to vertical and horizontal delineation. Further discussion related to this comment can be found in the General Comments section.

23. Section 2.2.1 (Paragraph 7) The report indicates that "the proportional number of samples sent to the laboratory for confirmation deviated from the anticipated percentages identified in the work plan." However, the percentages sent for confirmation deviated more than necessary based on 10% of collected samples being collected within the 201 mg/kg to 500 mg/kg range. Had all of these samples been used for confirmation, sample percentages representing the remaining two groups (0 to 200 mg/kg range and greater than 501 mg/kg range) would have deviated 12.5% (assuming a 19% split rate) from their planned percentages. It is noted that confirmation sampling should be collected at a frequency relative to the sampling rate, which would make satisfying the planned ranges more difficult.

24. Section 2.3 (Paragraph 1) This paragraph should indicate the type and model number of the XRF meter used for field analysis.

25. Section 2.3 (Paragraph 1) The first paragraph of this section describes the different media samples, borings and pits that were excavated as part of the ECS and references Figure 3 for the depiction of these various locations. Figure 3 does not differentiate the locations of the 53 sediment sample locations, the 118 soil borings or the six test pits. This figure is referenced throughout the Plan for locations of samples, test pits, soil borings and "systematic" sampling approach. This figure should be revised to include in the legend all the different sampling locations discussed.

26. Section 2.3 (Paragraph 2) The second sentence of this paragraph indicates that "STL Laboratories in Pittsburgh, PA analyzed 83 soil samples (excluding QA/QC samples) for confirmation purposes." This sentence should indicate the total number of samples analyzed including QA/QC samples. This would be consistent with the fourth paragraph which indicates that 91 samples were analyzed by the laboratory.

27. Section 2.3 (Paragraph 3) This paragraph indicates that "ENSR validated both the laboratory data and the XRF data." This is contrary to EPA Region III policy, which specifies that analytical data should be validated by an organization independent of the laboratory/organization that conducted the analytical testing.

28. Section 2.3 (Paragraph 5) The linear correlation range for lead does not appear to adequately represent many of the XRF sample results. Many of these results indicate percent concentrations of lead. The upper extent used was 2859.2 mg/kg.

29. Section 2.3 (Paragraph 6) The second sentence in this paragraph indicates that "Lead was the only metal that exceeded its screening level (i.e., 400mg/kg) in any of the samples analyzed by the XRF", however, XRF reporting levels for arsenic were all above the site screening level of 19 mg/kg. Arsenic was only detected in five XRF samples, but arsenic concentrations exceeded the screening level in 15 of the 83 soil samples sent for laboratory confirmation analysis. Based on the data presented, the XRF was not effective in screening site soils for arsenic. Further investigation to delineate arsenic may be warranted.

30. Section 2.3.1 (Paragraph 2) A review of the lead and arsenic data shows that neither the vertical nor the horizontal extent of these contaminants has been determined. For the XRF lead data, numerous sample locations (e.g., E-04, F-09, G-07, I-04, J-03, K-02, K-14, O-02, P-02, etc.) show lead contamination increasing with depth at concentrations above 400 parts per million (ppm). For the laboratory data, it was not possible to make such observation because the data presented in Table 3 does not identify the depth of the samples and no similar figure as Figure 4 is provided to identify the depth and locations of the samples. Therefore, from the information presented it is not possible to conclude that the extent of contamination at the site has been determined. Please revise the Plan to provide a more robust data evaluation including mapping the available results on figures so that the determination of whether the vertical and horizontal extent of contamination can be made. Based on such evaluation, the Plan should provide a list of data gaps and propose additional activities to fill any identified data gaps.

31. Section 2.3.1 (Paragraph 2) The elevated lead concentration associated with the analysis of sample collected at C-8 warrants further investigation of the area due to the proximity of this sample location with the elementary school and public library.

32. Section 2.3.1 (Paragraph 3) This section indicates that "the empirical information suggests that the lead is not highly mobile in the environment." Perhaps the information suggest that lead is not highly mobile in soil, however, there is evidence that powder-like batch material (analysis of sample IB-6) contained elevated lead concentrations that may have been highly mobile in the environment (air).

33. Section 2.3.1.2 This section indicates that "only 15 surface samples contained arsenic at a concentration greater than its screening level and only 5 subsurface soil samples contained arsenic at a concentration greater than its screening level (Table 3)." This represents approximately 18% of the 83 samples (excluding QA/QC). Table 3 does not provide depths of samples and the distinction between surface and subsurface is not clearly discussed in the text. The plan should be revised to provide the depths of arsenic samples and plot the results on a figure similar to Figure 4 or on Figure 4.

34. Section 2.3.1.3 (Paragraph 1) The first paragraph in this section indicates that sampling locations were focused in the vicinity of the transformers and references Figure 3 for sample locations. Figure 3 does not differentiate between sample locations for arsenic, lead or PCB. Please revise this figure to differentiate the sampling locations.

35. Section 2.3.1.3 (Paragraph 2) For polychlorinated biphenyls (PCBs), the Plan appears to confuse removal action level with the RBC value. Therefore, it compares the total PCB concentrations with the removal action level of 10 mg/kg and indicates that screening levels for the PCB congeners are inapplicable or unavailable. It then concludes that no PCB result exceed the screening level. The proper comparison should be to the RBC screening values. This comparison will reveal that aroclor 1254 and aroclor 1260 exceed their industrial RBC value of 1.4 mg/kg. Total PCB exceeds its industrial RBC at four locations. The Plan should be revised to conduct proper comparison of the sample results to the most current EPA Region III RBC Table, and revise any conclusions reached from the current comparisons.

36. Section 2.3.1.3 (General Comment) During the ECS investigation a layer of soil/waste that appeared to be saturated with a substance resembling diesel fuel (appearance of sheen and odor) was encountered at various depths at some of the sample locations. START requested a split sample at one of these locations and found it to be contaminated with PCBs. A further evaluation and discussion of this should appear in the report.

37. Section 2.3.1.4 (Paragraph 3) This paragraph does not include a description or mention of the surface soils located in the northern portion of the site.

38. Section 2.3.1.4 (Paragraph 4 and 5) Surface soils in the area of the Route 30 Bridge are affected by Ohio River flood events. It is possible that the flooding of September 2004 and January 2005 contributed a thin layer of sediment cover to this area, which may have added to earlier depositions from flood events.

39. Section 2.3.1.4 (Paragraph 9) The description of natural soil should be more detailed. Mostly all soils contain a relative sand, silt, and clay content.

40. Section 2.3.2 This section states "as with the soil analytical results, only lead was detected at a concentration greater than its screening level." It is unclear to what screening levels the sediment results were compared. Please revise the Plan to clarify if site-specific sediment screening levels were developed or if the RBC values were modified for this comparison.

41. Section 2.3.2.1 (Paragraph 1) This paragraph indicates that contamination associated with sample number SDMR06A "may be contributed to the use of the road crossing in this immediate area. There exists large amount of pottery debris in the hillside adjacent to Marks Run approximately 200 feet upstream of location SDMR06A. Although the contamination appears localized based on sampling results, due to the visually confirmed presence and amount of pottery debris and chards, further investigation of this area of Marks Run is warranted, and at the very least a small scale removal of creek sediment is suggested.

42. Section 2.3.2.2 (Paragraph 2) The report again attempts to marginalize a sample result reported to be above the screening for lead for a sample collected at location SDOH03 (reported to be 1314 mg/kg). The report suggests that this "concentration may be attributed to some source upstream of the Site, such as the former Edwin M. Knowles pottery facility. However, a sample collected (SDOH01) 1500 feet upstream of this location (beyond the Site boundary) had a lead concentration that was reported to be 35 mg/kg. Further, samples collected at P-02, a location close to and upgradient of location SDOH03, exhibited a surface sample result of 1233 mg/kg. The entire hillside area from the bank up to the plateau of the hill should be further evaluated in the vicinity of these and other (e.g., —02, –02, O-02) sample locations.

43. Section 2.3.4 — This section briefly mentions the samples and analysis conducted on the dielectric fluids in the six transformers at the site, and indicates that the analytical report for the transformer investigation is contained in Appendix D. Please revise the Plan to provide a summary of the transformer investigation in the text of the Plan and also provide the exact location of the report within Appendix D (there are nine subfolders within the Appendix D that was provided as a compact disc).

44. Section 3.0 — (General Comment) The report misinterprets the Consent Order by indicating that the criteria for instituting engineering controls (section 8.3(l)) also provides the opportunity for the respondent to conduct a risk assessment, whereby establishing updated (and in this case far less stringent) Removal Action Guidelines. Section 8.3(g), although in reference to excavation and removal, clearly establishes the Removal Action Guideline of 400 ppm or higher for lead in soils, ceramic and other debris. It should be clearly understood that it is the intent of the Consent Order that lead concentrations in surface soils at the site be less than 400 ppm following the corrective action implementation. This and subsequent comments pertaining to the proposed risk assessment assumptions, methodology, etc., address technical aspects of the proposal. These comments do not indicate that START deems that the performance of a risk-based clean-up is appropriate.

45. Section 3.2 — Arsenic is one of the additional contaminants listed in section 8.3(f) of the Consent Order. This section indicates that ATSDR will conduct a toxicological review of data associated with the additional contaminants that prove to be higher than ten times the industrial RBC value (April 14th, 2004 issue) of 1.9 mg/kg. This will be done in order to establish Site-specific Removal Action Guidelines. Therefore the Remedial Goals proposed/calculated by the risk assessment presented in the report are invalid.

46. Section 3.2.1.2 (Paragraph 1 and applies to later sections) The assumption that the likely trespassers "would be teenagers or young adults" is flawed. An elementary school is located within a few hundred feet of the facility (and closer to contamination identified outside the Site fence), and residents that live at the site (in the former office building) are believed to have small children based on observations made during Site visits. The rental garages do not limit elderly tenants or tenants with children from accessing the site. Also, just north of the facility (across the street) are numerous residential apartments that have been observed to house people of all potential receptor population groups. A significant amount of surface contamination has been identified at locations that are outside of the Site fence restrictions.

47. Section 3.3 (Paragraph 2, bullet 2) This section should also include provisions for monitoring airborne particulate levels of contaminants to ensure that the former office apartment(s) (as well as the nearby residential area and rental garages) are not exposed to contaminants regardless of whether or not the residents are present at the time of excavation. Also, the excavation procedure should include a provision for watering down the soils should dust become or be expected to become a problem.

48. Section 3.3 (Paragraph 2, bullet 6) It is again recommended that any work that could impact the integrity of the existing gas pipeline or well should be discussed with WVDEP Oil and Gas Division personnel.

49. Section 4.1.1 The third paragraph in this section states "The proposed remediation for Area 1 consists of excavation of soil to a depth of 2 feet. The excavated soil will be used in the grading of other areas of the Site (i.e., will remain on Site) ..." This is not consistent with Section 8.3.h of the Consent Order which requires disposal of contaminated soils and non-recyclable ceramic debris off-site in accordance with CERCLA Section 121 (d)(3), 42 U.S.C Section 9621 (d)(3), and 40 CFR Section 300.440. Please revise the Plan to provide a plan for disposal offsite of the excavated soils and other materials. This comment also applies to the proposed spot removal at Area 7 (Section 4.1.7). Also, this area was originally requested by EPA to be addressed previous to any other area on Site.

50. Section 4.1.2 (Paragraph 2) The Remedial Goal (RG) value of 2100 mg/kg is invalid as indicated and substantiated in previous comments. Lead exposure was evaluated as concentrations in soil for the purposes of the risk assessment presented in this report. Much of this area (western and southern hillside) is covered by debris and should not be considered to be soil. It is better defined as a waste material.

51. Section 4.1.2 (Paragraph 2) The second paragraph states "lead concentrations in surface soils in this area of the Site range from 32 to 34,284 mg/kg, the latter concentration being anomalous and believed to be influenced by its location at the base of a large area of exposed shards." It is unclear if this area of exposed shards was further investigated to determine its extent and whether it is a continuing source of contamination. Unless the horizontal and vertical extent of contamination at this location has been delineated using the historical and current data, it is inappropriate to dismiss it as anomalous. In addition, the Plan does not clearly define the actions that will be taken at locations where high lead contamination was found (for example, hot spot removal). Similarly, this comment applies to sample location I-04 which is identified as anomalous in Section 4.1.3. Please revise the Plan to address these issues.

52. Section 4.1.2 (Paragraph 3) This paragraph indicates that "A limited length (150 - 200 feet of Marks Run will be re-aligned as part of the remediation of this area..." This will need to meet the requirements of local, state and federal regulations regarding such action. At the very least, a sedimentation and erosion control plan will need to be approved by the state prior to conducting the proposed improvements.

53. Section 4.1.2 (Paragraph 3) This last sentence of this paragraph indicates that "suitable soil erosion control measures such as rip-rap drainage channels will be utilized to prevent erosion on the hillsides." Again, a sedimentation and erosion control plan should be written that will outline the specifics of the plan beyond suggestions that used.

54. Section 4.1.3 (Paragraph 2) Area 3A is proposed to have a one foot thick layer of soil fill applied as cover. It is unclear if the proposed plan is to move soil from another area of the site to this location. Regardless, the RG for lead which was proposed based on the risk assessment presented in this report is invalid (see comments 44, 45, and 46).

55. Section 4.1.3 (Paragraph 3) It is recommended in this paragraph that no remediation be conducted in Area 3B based on the RG value of 2100 mg/kg for lead. As mentioned in the previous comment the RG for lead (and arsenic as in comment number 47) are invalid (see comments 44, 45, and 46).

56. Section 4.1.4 The proposed remediation for Area 4 is to "cover the area with a one foot thick layer of soil fill. Again it is unclear if the fill will be "clean" fill, or if it will come from another area of the Site. Also, is not indicated if concerns in regards to permeability and grading of fill, revegetation, periodic inspection and maintenance of fill cover are addressed. The report should include a discussion of all applicable related concerns.

57. Section 4.1.5 The proposed remediation for Area 5 "will consist of additional access prevention in the form of additional fencing being installed along the eastern boundary of the property." Beyond the fact that the RG values are invalid, this proposed remediation is unacceptable due to, but not limited to, the following two reasons: the contamination near the eastern boundary is observed at the top (P-02) and the bottom (SDOH03) of the slope; and the lead level of 143,033 mg/kg reported in paragraph two of this section is significantly above both the RAG of 400 ppm and the proposed RG of 2100 mg/kg. If contamination is permitted to remain at the surface then the potential fo continued off-site migration of these contaminants will persist.

58. Section 4.1.6 It may be possible to use the material (clay) in the silos in whole or in part as fill for cover or for grading purposes.

59. Section 4.1.7 This area (Area 7) is outside the Site fence and closer to the school than most of the areas. Without considering that the RG values proposed are invalid, spot remediation can not be accomplished without a more thorough delineation of the contamination in the area of sample location E-04.

60. Section 4.1.8 The same applies in regards to the proposed remediation at Area 8 as is listed in the previous comment.

61. Section 4.1.9 See comment 42.

62. Section 4.3 — Some of the proposed post-removal action site controls will be prohibitive as to the future use of the property. These site controls should be approved by not only EPA, but by the site owner. Also, deed restrictions will have to meet the approval of the Department of Highways and perhaps the appropriate City of Chester/Hancock County representatives in areas where right-of-ways exist.

63. Table 2 — Please provide a discussion of how the XRF results were corrected and the rationale for correcting them. In addition, provide units of concentration for the data presented in this table. Also, explain the reason for having varying reporting limits for the same constituent and between samples and whether these high reporting limits made it impossible to compare the results to the RBC values which are much lower than the reporting limits used.

64. Table 3 — Please provide the depths of samples on this table. Also, provide a reference for the screening levels used.

General Comments

65. General — ENSR applied a 0.90x "correction" factor based on a statistical analysis of XRF and laboratory confirmation results. They also applied correction factors to analytical data for copper and zinc. It is very relevant to determine the correlation between the field screening (XRF) and laboratory data; however, in order to be conservative, TechLaw recommends against applying "correction factors" to the XRF results for lead. The XRF data presented in Table 2 has been adjusted by using the statistical correction factors. Without the correction factors, the lead concentrations of an additional twelve samples exceed the 400 milligrams per kilogram (mg/kg) screening level. A correction factor of 1.15 was used for copper. This resulted in higher concentrations and provides a conservative estimate of the copper concentrations.

66. General — No equipment rinsate blanks were submitted for metals or PCB analysis.

67. General — PCB batch MS/MSDs were not done on site samples, but on other samples from other sites analyzed in the same batch. This is not ideal due to potentially significant differences in matrix effects. Additionally, the MS/MSD results were not reported for most of the samples. Surrogate recoveries were within specified ranges or high, when outside limits.

68. General

The data for the analyses were reviewed with reference to EPA Region 3 Innovative Approaches to Data Validation as modified for non-CLP analyses.

69. General

One of the objectives of the Extent of Contamination Study (ECS) was to delineate the nature and extent of adversely impacted soil. However, the Removal Action Implementation Plan (Plan) which presents the results of the ECS does not provide a comprehensive evaluation of all the results including the historical data to define the horizontal and vertical extent of lead, PCB and arsenic contamination at the site. Even for the ECS results, the Plan does not present the data in such a way that vertical and horizontal extent of contamination can be understood. For example, the x-ray fluorescence analyzer (XRF) results are plotted on Figure 4; however, the results for the laboratory are not plotted on any figures or included in Figure 4. This makes the determination of whether the extent of contamination if fully characterized difficult. In addition, there are no figures showing the historical sampling locations and results for comparison to the ECS sampling locations and results. It is recommended that all data available for the site be evaluated, and comprehensive maps delineating the horizontal and vertical extent of contamination be presented (e.g., isoconcentration maps for lead and arsenic would be helpful).

70. General

In general, the Plan does not provide a conceptual site model (CSM) to evaluate all exposure pathways and receptors, and rule out those pathways that are determined incomplete. If warranted, site-specific remedial goals should be developed after such an assessment, based on all exposure pathways and receptors.

71. General

Except for the attempt in statistical correlation of the XRF data with the laboratory data, the report does not provide a spatial relationship between the XRF sample locations and laboratory confirmation samples. The criteria that were used to send samples to the laboratory are not clearly presented. For example, it is not clear if laboratory confirmation samples were selected based on the level of concentration indicated by the XRF results. Revise the Plan to show the locations of the laboratory confirmation samples in relation to the XRF samples locations. A defined number per batch of samples should have been submitted for confirmation. Plotting the locations, depth and concentration of the laboratory results on Figure 4 will be very helpful.

72. General	The Plan does not appear to be concerned with a complete characterization of the source of contamination at the site. It appears to exclude from investigation anything that the investigators considered not related to the former pottery manufacturing activities. This disregard for anything onsite but not associated with the pottery manufacturing activities may lead to an incomplete source characterization and current site conditions. For example, even though numerous drums containing unknown materials were found onsite, they were not further investigated (e.g., to determine their integrity and sample their contents) because it was concluded the drums were not used in pottery manufacturing. However, these drums may be one source of contamination at the site. Revise the Plan to address this data gap and identify any measures that will be taken to fill this data gap.
73. General	Section 8.3.j of the Consent Order requires a post-removal sampling be proposed. No post-removal sampling is proposed in the Plan. Please explain why a post-removal sampling is not required for the areas proposed for excavation and removal.
74. General	Section 8.3.l of the Consent Order requires disposal of contaminated water generated during sampling in accordance with applicable laws and regulations. The Plan does not discuss how the investigation-derived waste was disposed or will be disposed. The Plan should provide this information.